

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JIMMY DWAYNE JEFFLO,  
a/k/a JIMMIE DWAYNE JEFFLO,  
a/k/a MAC, a/k/a POPS,  
a/k/a JOHNSAPRANO73;  
ZAKIYAH WILLIAMS;  
DEMETRIUS R. DRAPER;  
DEONTE DESHAUN CURL;  
MALIK DAMONE DUHON,  
a/k/a KASH;  
MERCEDES SHAWNAMA JEFFLO,  
a/k/a BENZO;  
AMBER MARIE LABAUVE;  
PAULA DENISE HESS;  
MADILYN KAY DON MOON;  
TAMMY LYNN INMAN;  
SUMMER DAWN WAHUS; and  
LORIN DAMIEN ST. CLAIRE

INDICTMENT

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C),  
843(b), 846, and 853; and 18 U.S.C. § 2

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COUNT ONE

**Conspiracy to Distribute and Possess with Intent to Distribute  
Controlled Substances**

The Grand Jury Charges:

Beginning in or about 2021 and continuing until the present, in the District of  
North Dakota, and elsewhere,

JIMMY DWAYNE JEFFLO, a/k/a JIMMIE DWAYNE JEFFLO, a/k/a MAC, a/k/a  
POPS, a/k/a JOHNSAPRANO73;  
ZAKIYAH WILLIAMS;  
DEMETRIUS R. DRAPER;  
DEONTE DESHAUN CURL;  
MALIK DAMONE DUHON, a/k/a KASH;  
MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO;

AMBER MARIE LABAUVE;  
PAULA DENISE HESS;  
MADILYN KAY DON MOON;  
TAMMY LYNN INMAN;  
SUMMER DAWN WAHUS; and  
LORIN DAMIEN ST. CLAIRE,

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute controlled substances, including: (i) a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; (ii) a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance; (iii) a mixture and substance containing a detectable amount of an analogue of fentanyl, namely, para-Flourofentanyl, a Schedule I controlled substance; and (iv) a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Drug Quantity

With respect to JIMMY DWAYNE JEFFLO, a/k/a JIMMIE DWAYNE JEFFLO, a/k/a MAC, a/k/a POPS, a/k/a JOHNSAPRANO73; ZAKIYAH WILLIAMS; DEMETRIUS R. DRAPER; MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO; and LORIN DAMIEN ST. CLAIRE, the amount of methamphetamine involved in the conspiracy attributable to each of these individuals as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual,

is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to JIMMY DWAYNE JEFFLO, a/k/a JIMMIE DWAYNE JEFFLO, a/k/a MAC, a/k/a POPS, a/k/a JOHNSAPRANO73; ZAKIYAH WILLIAMS; DEMETRIUS R. DRAPER; LORIN DAMIEN ST. CLAIRE; and MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO, the amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”) involved in the conspiracy attributable to each of these individuals as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), and 10 grams or more of a mixture and substance containing a detectable amount of an analogue of fentanyl, namely, para-Flourofentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(B).

#### Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that conspirators mailed, shipped, and transported packages containing controlled substances from California and Nevada to North Dakota for purposes of distribution;
2. It was further a part of said conspiracy that conspirators mailed, shipped, and transmitted through money wire services and media applications, proceeds of drug trafficking activity from North Dakota to California, and elsewhere;

3. It was further a part of said conspiracy that conspirators would and did distribute, and possess with intent to distribute, controlled substances, including methamphetamine, opiate pills and tablets containing fentanyl and para-Flourofentanyl, and heroin, and other drugs, in and about the Fort Berthold Indian Reservation in North Dakota, in Bismarck-Mandan, North Dakota, and elsewhere;

4. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities by, among other things, using aliases and false names; concealing controlled substances within their persons and in containers; using social media applications that delete communications; and threatening and intimidating conspirators and cooperating individuals;

5. It was further a part of said conspiracy that conspirators possessed firearms to protect their supply of controlled substances and proceeds of drug trafficking activity, and to intimidate others;

6. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;

7. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, and social media applications, such as Signal, Cash App, and Facebook Messenger, to facilitate the distribution of controlled substances and collection of drug proceeds;

8. It was further a part of said conspiracy that defendants and others traveled between California, Las Vegas, Nevada, and North Dakota, for purposes of transporting controlled substances and proceeds of drug trafficking activity;

9. It was further a part of said conspiracy that conspirators would utilize residences, hotels, and AirBNB's in New Town and Bismarck-Mandan, North Dakota, to store, conceal, and distribute controlled substances, and to receive, collect, store, and conceal proceeds of drug trafficking activity; and

10. It was further a part of said conspiracy that conspirators utilized local North Dakota residents as sub-distributors and associates to locate customers and consumers of controlled substances;

In violation of Title 21, United States Code, Section 846; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Illegal Use of Communication Facility**

The Grand Jury Further Charges:

From in or about August 2022 through the date of this Indictment, in the District of North Dakota, and elsewhere,

JIMMY DWAYNE JEFFLO, a/k/a JIMMIE DWAYNE JEFFLO, a/k/a MAC, a/k/a  
POPS, a/k/a JOHNSAPRANO73;  
ZAKIYAH WILLIAMS;  
DEMETRIUS R. DRAPER;  
DEONTE DESHAUN CURL;  
MALIK DAMONE DUHON, a/k/a KASH;  
MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO;  
AMBER MARIE LABAUVE;  
PAULA DENISE HESS;  
MADILYN KAY DON MOON;  
TAMMY LYNN INMAN;  
SUMMER DAWN WAHUS; and  
LORIN DAMIEN ST. CLAIRE,

individually, and by aiding and abetting, knowingly and intentionally used a communication facility, specifically, the United States Postal Service, in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Section 846, that is, the offense set forth in Count One of this Indictment, which is incorporated by reference herein;

In violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

COUNT THREE

**Possession with Intent to Distribute Methamphetamine  
(50 grams or more – mixture)**

The Grand Jury Further Charges:

On or about September 17, 2021, in the District of North Dakota,

MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

**Possession with Intent to Distribute a Controlled Substance  
(40 grams or more – Fentanyl, or 10 grams or more – Fentanyl Analogue)**

The Grand Jury Further Charges:

On or about September 17, 2021, in the District of North Dakota, and elsewhere,

MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, approximately 821 opiate pills that were (i) 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance; and (ii) 10 grams or more of a mixture and substance containing a detectable amount of a fentanyl analogue, namely, para-Flourofentanyl, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.



COUNT FIVE

**Distribution of Controlled Substances**

The Grand Jury Further Charges:

On or about October 25, 2022, in the District of North Dakota,

PAULA DENISE HESS,

individually, and by aiding and abetting, knowingly and intentionally distributed controlled substances, including: (i) a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and (ii) a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

**Distribution of Controlled Substances**

The Grand Jury Further Charges:

On or about November 23, 2022, in the District of North Dakota,

ZAKIYAH WILLIAMS,

individually, and by aiding and abetting, knowingly and intentionally distributed controlled substances, including, approximately 100 opiate pills and tablets that were a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

**Distribution of Controlled Substances**

The Grand Jury Further Charges:

On or about December 1, 2022, in the District of North Dakota,

MADILYN KAY DON MOON,

individually, and by aiding and abetting, knowingly and intentionally distributed controlled substances, including, approximately 100 opiate pills and tablets that were a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

As a result of committing one or more of the controlled substance offenses alleged in Counts One, Two, Three, Four, Five, Six and Seven of this Indictment,

JIMMY DWAYNE JEFFLO,  
a/k/a JIMMIE DWAYNE JEFFLO,  
a/k/a MAC, a/k/a POPS,  
a/k/a JOHNSAPRANO73;  
ZAKIYAH WILLIAMS;  
DEMETRIUS R. DRAPER;  
DEONTE DESHAUN CURL;  
MALIK DAMONE DUHON,  
a/k/a KASH;  
MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO;  
AMBER MARIE LABAUVE;  
PAULA DENISE HESS;  
MADILYN KAY DON MOON;  
TAMMY LYNN INMAN;  
SUMMER DAWN WAHUS; and  
LORIN DAMIEN ST. CLAIRE,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Counts One, Two, Three, Four, Five, Six and/or Seven of this Indictment, including but not limited to the following:

- Approximately \$2,137.00 in United States currency seized on or about September 17, 2021, at a residence in New Town, North Dakota; and,

- Approximately \$20,310.00 seized from USPS Priority Mail Express package displaying tracking number 9570126502062302836821 mailed from Bismarck, North Dakota.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of JIMMY DWAYNE JEFFLO, a/k/a JIMMIE DWAYNE JEFFLO, a/k/a MAC, a/k/a POPS, a/k/a JOHNSAPRANO73; ZAKIYAH WILLIAMS; DEMETRIUS R. DRAPER; DEONTE DESHAUN CURL; MALIK DAMONE DUHON, a/k/a KASH; MERCEDES SHAWNAMA JEFFLO, a/k/a BENZO; AMBER MARIE LABAUVE; PAULA DENISE HESS; MADILYN KAY DON MOON; TAMMY LYNN INMAN; SUMMER DAWN WAHUS; and LORIN DAMIEN ST. CLAIRE, up to the value of the above-listed forfeitable property;

In violation of Title 21, United States Code, Section 853.

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Mac Schneider  
MAC SCHNEIDER  
United States Attorney

RLV/sj